

# EXHIBIT 2

**UNITED STATES BANKRUPTCY COURT  
Eastern District of Michigan**

**In re:**

City of Detroit, Michigan  
2 Woodward Avenue  
Suite 1126  
Detroit, MI 48226

**Chapter: 9**

**Case No. 13-53846**

**Debtor(s)**

**Hon. Steven W. Rhodes**

Address: City of Detroit, Michigan  
2 Woodward Avenue  
Suite 1126  
Detroit, MI 48226

Employer's Tax Identification (EIN): 38-6004606

**NOTICE OF MOTION AND OPPORTUNITY TO OBJECT**

AFSCME Council 25 and its Affiliated Detroit Locals has filed papers with the court to request the court permissively abstain and to remand the claims contained in Proof of Claim #2958

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)**

If you do not want the court to permissively abstain and to remand the claims contained in Proof of Claim #2958, or if you want the court to consider your views on the motion, within 14 days, you or your attorney must:

1. File with the court a written response or an answer, explaining your position at:<sup>1</sup>

**United States Bankruptcy Court**  
211 West Fort Street  
Detroit, MI 48226

If you mail your response to the court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above. All attorneys are required to file pleadings electronically.

You must also mail a copy to:

Richard G. Mack, Jr., Esq.  
MILLER COHEN PLC  
600 West Lafayette Blvd., 4th Floor  
Detroit, MI 48226-3191  
Telephone: (313) 964-4454  
Facsimile: (313) 964-4490  
richardmack@millercohen.com

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<sup>1</sup> Response or answer must comply with F. R. Civ. P. 8(b), (c) and (e)

2. If a response or answer is timely filed and served, the clerk will schedule a hearing on the motion and you will be served with a notice of the date, time and location of the hearing.

**If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.**

Dated: December 2, 2014

/s/ Richard G. Mack, Jr.

Richard G. Mack, Jr., Esq.

Jack W. Schulz, Esq.

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